

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
Nicole Walker-Edwards	:	Chapter 13
	:	No.: 18-15339-ELF
Debtor(s)	:	

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RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC  
STAY FILED BY CARRINGTON MORTGAGE SERVICE, LLC

Debtor, Nicole Walker-Edwards, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Carrington Mortgage Service, LLC hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Denied
5. Denied.
6. Denied.
7. Debtor opposes the same..
8. Denied.
9. No objection.
10. No response required.
11. No response required.

WHEREFORE, based on the aforementioned, Debtors respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Dated: March 14, 2022

/s/ Brad J. Sadek, Esq.

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Brad J. Sadek, Esq.  
Attorney for the Debtor  
Sadek & Cooper  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
(215) 545-0008

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**CERTIFICATE OF SERVICE**

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**Kenneth E. West**  
Standing Chapter 13 Trustee  
Electronic Notice

**Marisa Myers Cohen Esq.**  
Attorney for Movant *Carrington Mortgage Service, LLC*.  
Electronic Notice to *ecfmail@mwc-law.com*

Dated: March 14, 2022

/s/Brad J. Sadek, Esq  
Brad J. Sadek, Esq.  
Attorney for Debtor  
1315 Walnut Street  
Suite #502  
Philadelphia, PA 19107